

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

John K. Goodrow,	:	
Plaintiff,	:	
v.	:	Civil Action No: 3:11-cv-00020-MHL
Friedman & MacFadyen, P.A. and	:	
Johnie R. Muncy,	:	
Defendants.	:	
<hr style="border-top: 3px double #000;"/>		
Michelle McBeth,	:	
Plaintiff,	:	
v.	:	Civil Action No: 3:11-cv-00479-MHL
Friedman & MacFadyen, P.A. and	:	
Johnie R. Muncy,	:	
Defendants.	:	
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Adam Mbundure,	:	
Plaintiff,	:	
v.	:	Civil Action No: 3:11-cv-00489-MHL
Friedman & MacFadyen, P.A. and	:	
Johnie R. Muncy,	:	
Defendants.	:	
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Albert C. Ceccone,	:	
Plaintiff,	:	
v.	:	Civil Action No: 3:11-cv-00555-MHL
Friedman & MacFadyen, P.A. and	:	
Johnie R. Muncy,	:	
Defendants.	:	
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Allen Chatter, :

Plaintiff, :

v. : Civil Action No: 3:11-cv-00613-MHL

Friedman & MacFadyen, P.A., :

F&M Services, L.C. and :

Johnie R. Muncy, :

Defendants. :

Letonya Banks, :

Plaintiff, :

v. : Civil Action No: 3:11-cv-00614-MHL

Friedman & MacFadyen, P.A., :

F&M Services, L.C. and :

Johnie R. Muncy, :

Defendants. :

Ivery Hicks, :

Plaintiff, :

v. : Civil Action No: 3:11-cv-615-MHL

Friedman & MacFadyen, P.A., :

Miriam S. Fuchs, Jeffrey Huston, :

James J. Loftus, Kenneth J. MacFadyen, :

And Daniel Menchel, :

Defendants. :

Knorly Smith, :

Plaintiff, :

v. : Civil Action No: 3:11-cv-00616-MHL

Friedman & MacFadyen, P.A., :

Miriam S. Fuchs, Jeffrey Huston, :

James J. Loftus, Kenneth J. MacFadyen, :

And Daniel Menchel, :

Defendants. :

Peter Crawley,	:	
Plaintiff,	:	
v.	:	Civil Action No: 3:11-cv-00617-MHL
Friedman & MacFadyen, P.A.,	:	
F&M Services, L.C. and	:	
Johnie R. Muncy,	:	
Defendants.	:	

Laurel Buel and	:	
Milton Buel,	:	
Plaintiffs,	:	
v.	:	Civil Action No: 3:11-cv-00716-MHL
Friedman & MacFadyen, P.A.,	:	
F&M Services, L.C. and	:	
Johnie R. Muncy,	:	
Defendants.	:	

PLAINTIFFS' MEMORANDUM IN SUPPORT OF
CONSENT MOTION TO STAY

Plaintiffs have moved pursuant to Fed. Civ. P. 16(c)(2) that the above-styled cases be stayed to permit the Parties the opportunity to engage fully in mediation through a private mediator (under the Court's supervision).

Pursuant to Federal Rules of Civil Procedure 16(c)(2), Plaintiffs in each of the above-styled cases move, with the consent of the Defendants, that the above actions be stayed to permit the Parties the opportunity to engage fully in mediation through a private mediator (under the Court's supervision). The Parties have each consented to jurisdiction of this Court. They share

the objective of establishing an efficient and effective process to attempt mediation of these cases. Only two of the matters are currently past their Rule 16(b) scheduling conference.

A district court has the inherent power to manage its own affairs so as to achieve the orderly and expeditious disposition of cases. *Lewis v. Rawson*, ___ F.3d ___, 2009 WL 1119651, *4 (2d Cir. Apr. 28, 2009) (quoting *Link v. Wabash R.R. Co.*, 370 U.S. 626, 630-31 (1962)).

Respectfully submitted,

/s/

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on November 10, 2011, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing (NEF) to the following:

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